

FILED

4:29 pm, Aug 14, 2020

**U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk**

ATTACHMENT 1

COMPLAINT FORM

(for filers who are prisoners without lawyers)

IN THE UNITED STATES DISTRICT COURT
FOR THE 7th DISTRICT OF Indiana

(Full name of plaintiff(s))

Solorio Veronica

vs

Case Number:

2:20-cv-419-JRS-MJD

(Full name of defendant(s))

(to be supplied by clerk of court)

Penny Elmore, C.M.A.

Dr. William Wilson, M.D.

Mr. Tommy J. Watson, Warden

A. PARTIES

1. Plaintiff is a citizen of California, and is located at
(State)

4700 S. Bureau Road, Terre Haute, Indiana 47808 (P.O. BOX 33)
(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Penny Elmore
(Name)

is (if a person or private corporation) a citizen of Indiana
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Federal Bureau of Prisons, U.S.P. Terre Haute
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Mrs. Penny Elmore, who is a C.M.A. with the Federal Bureau of
Prison's at Terre Haute, showed deliberate indifference towards
this Plaintiff in failing to provide medical attention to an issue
that was life threatening on Sept. 27, 2019 when this Plaintiff
was given a direct order from Correctional Officer's to report to
the Medical Department at U.S.P. Terre Haute after this Plaintiff
was experiancing adominal pain, nausea, dizziness, and dibiliating
conditions limiting this Plaintiff's ability to even get out of
bed, and instead Defendant Elmore threaten this Plaintiff with

2. Defendant Dr. William Wilson, M.D., is a citizen of Indiana, whose address is unknown, & worked for the Federal Bureau of Prisons, U.S.P. Terre Haute.

2. Defendant Tommy J. Watson, Warden, is a citizen of Indiana, whose address is unknown, & Worked for the Federal Bureau of Prisons, U.S.P. Terre Haute.

with disciplinary action if he (Plaintiff) did not return to his housing unit. By September 30, 2019 when this Plaintiff was finally sent to the hospital, this Plaintiff's life was in full jeopardy. (Hospital Medical Reports are available.).

Defendant Dr. William Wilson, M.D. against medical advice from the Hospital doctor's including this Plaintiff's surgeon, from the Terre Haute Prison, did infact contact the Hospital and have this Plaintiff returned to the prison with medical tubing inside this Plaintiff that placed this Plaintiff at risk of harm/death in a prison setting. (Institutional Records are available).

Defendant Tommy J. Watson, Warden being the highest ranking member in the prison, did infact hire and give certain instructions on how the medical department is to be run within the facility. It is the Warden's responsibility to maintain a health service department in accordance with Program Statement 6013.01. (Policy is available).

This Plaintiff can and will show beyond a reasonable doubt that the Defendant's listed infact showed diliberate indifference to this Plaintiff that placed his life in jeopardy, caused severe pain and suffering and then attempted to cover these issues. (Administrative Remedies Filed and Responses Available).

C. JURISDICTION

☒ I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

☐ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

I am seeking a monetary judgment in the amount of \$1,000,000.00

or of a judgment awarded by a fair and impartial jury. I would also

seek a transfer to a medical facility in the state of Arizona to

be closer to my family as well as be provided better medical care

under emergency circumstances like what took place and was neglected

at this current facility respectfully.

E. JURY DEMAND

☒ Jury Demand - I want a jury to hear my case
OR

☐ Court Trial – I want a judge to hear my case

Dated this 11th day of August 2020.

Respectfully Submitted,

Solario Veronica
Signature of Plaintiff

16016-112
Plaintiff's Prisoner ID Number

United States Penitentiary

P.O. BOX 33, Terre Haute, Indiana 47808-0033
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.